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Attorneys for Plaintiff:
VACATION BIKE RENTALS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VACATIONAL BIKE RENTALS, LLC,) Case No.: 2:24-cv-07105-CAS-MAA
A LIMITED LIABILITY COMPANY,)

Plaintiff,

vs.

KITZUMA CORPORATION, A
CORPORATION, DBA KITZUMA
CYCLING LOGISTICS; BIKEEXCHANGE
LIMITED, AN AUSTRALIAN COMPANY,
DBA KITZUMA CORPORATION AND
KITZUMA CYCLING LOGISTICS;
GETCARRIER, LLC, A LIMITED
LIABILITY COMPANY; AND EMPIRE
NATIONAL, INC., A CORPORATION.

Defendants.

PLAINTIFF'S REQUEST FOR
DISMISSAL WITHOUT PREJUDICE AS
TO DEFENDANT SPEED EXPRESS,
INC.A CORPORATION, FROM THE
FIRST AMENDED COMPLAINT.

Comes Now, VACATIONAL BIKE RENTALS, LLC, hereafter
"Plaintiff", with its REQUEST FOR DISMISSAL WITHOUT PREJUDICE AS
TO DEFENDANT SPEED EXPRESS, INC.A CORPORATION, FROM THE FIRST
AMENDED COMPLAINT.

Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, Plaintiff VACATIONAL BIKE RENTALS, LLC ("Plaintiff") hereby requests that the Court to Dismiss Defendant **SPEED EXPRESS, INC. A CORPORATION** without prejudice from the Plaintiff's First Amended Complaint, in the above-captioned action.

Grounds for Dismissal: Plaintiff brings this action under federal diversity jurisdiction pursuant to 28 U.S.C. § 1332. Upon further review, Plaintiff has determined that Defendant Speed Express, Inc. is a corporation organized under the laws of the State of California with its principal place of business in California. Because Plaintiff is also a citizen of California for diversity purposes, the inclusion of Speed Express, Inc. as a defendant destroys complete diversity of citizenship required under 28 U.S.C. § 1332(a).

Dismissal Terms:

Defendant: Speed Express, Inc

Dismissal: Without Prejudice

Each party shall bear its own attorneys' fees and costs in connection with this Action.

Dated: 6/24/25

By: 

RICHARD L. GRANT, ESQ.
ATTORNEY FOR PLAINTIFF
VACATION BIKE RENTALS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on **June 24, 2025** a true and correct copy of the **Request for Dismissal without Prejudice** as to **Defendant Speed Express, Inc.** was electronically filed with the Federal Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: **6/24/2025**

By: 

RICHARD L. GRANT

PROPOSED ORDER

IT IS HEREBY ORDERED that Defendant Speed Express, Inc., A Corporation, is dismissed from the First Amended Complaint without prejudice.

Each party shall bear its own attorneys' fees and costs related to this Action.

IT IS SO ORDERED.

Dated: _____

UNITED STATES DISTRICT JUDGE
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA